



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road  
Twinsburg, OH 44087-1924

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director

May 25, 2005

Ms. Allison Knowles  
Von Roll America, Inc.  
1250 St. George Street  
East Liverpool, OH 43920

**Re: Hazardous Waste Permit Modification, Class 1 Acknowledgment (replace coordination agreements in Section G), Von Roll America, Inc.  
OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio EPA is in receipt of a notification dated April 11, 2005 from Von Roll America, Inc. (VRA) describing a Class 1 hazardous waste permit modification. With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51 and accordingly has updated the facility's Part B permit application and permit. This Class 1 permit modification was assigned a permit information tracking system (PITS) ID number of 050412-1-1.

This modification involves the addition of information to Section G - Contingency Plan, to replace the existing coordination agreement. The modification also affected the Hazardous Waste Permit Renewal journalized on March 23, 2005.

Changes to the Part B permit application include:

- **Replace the cover page for Section G with Revision 18 dated April 11, 2005**  
new revision date only
- **Replace the cover page for Attachment G.3 with Revision 18 dated April 11, 2005**  
new revision date only
- **Replace the Mutual Coordination Agreement in Attachment G.3**  
with the new coordination agreement. Remove the previous agreement, as it is no longer effective.

Changes to the Ohio Hazardous Waste Facility Installation and Operation Permit Renewal journalized on March 23, 2005 include:

- **Revision to page 23 of 117, B.13. Arrangements with Local Authorities (a)(iv)**  
to acknowledge the revised agreement.

RECEIVED  
OHIO EPA

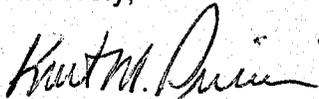
JUN - 6 2005

DIV. OF HAZARDOUS  
WASTE MGT.

VON ROLL AMERICA, INC.  
CLASS 1 ACKNOWLEDGMENT  
PAGE - 2 -

Enclosed are copies of the permit application revisions and also the permit renewal revision to page 23. These have been included to ensure that all involved parties have written confirmation of the changes. If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA Northeast District Office (330) 963-1234 or the East Liverpool Field Office (330) 385-8421.

Sincerely,



Kurt M. Princic  
Environmental Manager  
Division of Hazardous Waste Management

KMP:ddw

cc: Pamela Allen, Manager, ITTSS, DHWM, CO  
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO  
John Nyers, DHWM, CO  
Gary Victorine, USEPA, Region V  
ec: Frank Popotnik, DHWM, NEDO  
Michelle Tarka, DHWM, NEDO  
Patricia Natali, DHWM, NEDO

keywords: Class 1, Section G, coordination agree



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road  
Twinsburg, OH 44087-1924

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director

June 8, 2005

Ms. Allison Knowles  
Von Roll America, Inc.  
1250 St. George Street  
East Liverpool, OH 43920

RECEIVED  
OHIO EPA  
JUN 10 2005  
DIV. OF HAZARDOUS  
WASTE MGT.

**Re: CORRECTION - Hazardous Waste Permit Modification, Class 1 Acknowledgment (replace coordination agreements in Section G), Von Roll America, Inc. , OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio EPA received a notification dated April 11, 2005 from Von Roll America, Inc. (VRA) describing a Class 1 hazardous waste permit modification to add information to Section G - Contingency Plan, to replace the existing coordination agreement. This modification was assigned a permit information tracking system (PITS) ID number of 050412-1-1. Ohio EPA acknowledged the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51 with a letter dated May 25, 2005, and updated the facility's Part B permit application and the Ohio Hazardous Waste Facility Installation and Operation Permit Renewal journalized on March 23, 2005.

The change to the Ohio Hazardous Waste Facility Installation and Operation Permit Renewal journalized on March 23, 2005 included a revision to page 23 of 117, B.13. Arrangements with Local Authorities (a)(iv), to acknowledge the revised agreement. The revised permit page 23 which was attached to the Ohio EPA's May 25, 2005 letter regarding this modification contained an error in the date in the upper right corner of the letter. **This page has been corrected to indicate "Class 1 Modification received 4/12/2005.**

**Enclosed is a copy of the CORRECTED permit renewal revision to page 23.** Please ensure that the corrected page is inserted in the Ohio Hazardous Waste Facility Installation and Operation Permit Renewal journalized on March 23, 2005. If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA Northeast District Office (330) 963-1234 or the East Liverpool Field Office (330) 385-8421.

Sincerely,

Frank Popotnik  
Division of Hazardous Waste Management

FP:ddw  
Enclosure

cc: Pamela Allen, Manager, ITTSS, DHWM, CO  
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO  
John Nyers, DHWM, CO  
Michelle Tarka, DHWM, NEDO  
Gary Victorine, USEPA, Region V

keywords: Correction, Section G, coordination agree

**B.13. Arrangements with Local Authorities**  
**OAC Rule 3745-54-37**

- (a) The Permittee shall comply with the requirements of OAC Rule 3745-54-37 (A) by making a diligent effort to:
  - (i) familiarize all emergency response agencies, which are likely to respond in an emergency, with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in the Contingency Plan, Section G of the approved Part B permit application;
  - (ii) inform such agencies of safety equipment, supplies, and proper emergency safety procedures that are applicable to the facility and any further requirements related to emergency response imposed by terms and conditions of this permit;
  - (iii) familiarize the local police and fire departments, hospitals, and any other local emergency service, with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from incidents such as fires, explosions, or releases at the facility, and exposure to the hazardous waste constituents; and
  - (iv) abide with the agreement between VRA and the CITY OF East Liverpool PUBLIC SAFETY FORCES ~~Fire Department~~ regarding the primary emergency authority and support to the primary emergency authority. This agreement can be found in Section G, Contingency Plan, of the approved Part B permit application.
- (b) When a State or local agency declines to enter into the arrangements set forth in OAC Rule 3745-54-37(A), the Permittee shall document the refusal in the operating record as required by OAC Rule 3745-54-37(B).
- (c) The Permittee shall, in accordance with OAC Rule 3745-54-53, submit a copy of its contingency plan, including all amendments, revisions, or changes, to the local authorities designated in the contingency plan. The Permittee shall notify the local authorities, in writing, within ten days of the effective date of any amendments, revisions, or changes to the contingency plan.